

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DEBORAH CHIN, Individually and on behalf of all others similarly situated,)
Plaintiff,)
v.)
SONUS NETWORKS, INC., HASSAN AHMED and STEPHEN NILL,)
Defendants.)
MICHELLE TREBITSCH, on Behalf of Herself and All Others Similarly Situated,)
Plaintiff,)
v.)
SONUS NETWORKS, INC., HASSAN M. AHMED and STEPHEN J. NILL,)
Defendants.)

Additional Captions to Follow

[PROPOSED] ORDER CONSOLIDATING THE ACTIONS, APPOINTING LEAD PLAINTIFF AND APPROVING SELECTION OF LEAD AND LIAISON COUNSEL

INFORMATION DYNAMICS, LLC, on behalf of Itself)
and all Others Similarly Situated,) Civil Case 1:04-cv-10308 DPW
Plaintiff,)
v.)
SONUS NETWORKS, INC., PAUL R. JONES,)
EDWARD N. HARRIS, J. MICHAEL O'HARA,)
HASSAN AHMED and STEPHEN NILL,)
Defendants.)

PETER KALTMAN, on Behalf of Himself and All)
Others Similarly Situated,) Civil Case 1:04 cv 10309 DPW
Plaintiff,)
v.)
SONUS NETWORKS, INC., RUBIN GRUBER,)
HASSAN M. AHMED and STEPHEN J. NILL,)
Defendants.)

SAMANTHA DEN, Individually and On Behalf of All)
Others Similarly Situated,) Civil Case 1:04 cv 10310 DPW
Plaintiff,)
v.)
SONUS NETWORKS, INC., HASSAN M. AHMED)
and STEPHEN J. NILL,)
Defendants.)

RICHARD CURTIS, Individually and on behalf of all others Similarly Situated,)
Plaintiff,)
v.)
SONUS NETWORKS, INC., HASSAN AHMED and STEPHEN NILL,)
Defendants.)

RONALD KASSOVER, on Behalf of the RONALD KASSOVER IRA and All Others Similarly Situated,)
Plaintiff,)
v.)
SONUS NETWORKS, INC., HASSAN M. AHMED and STEPHEN J. NILL,)
Defendants.)

STEVE L. BAKER, Individually and On Behalf of All Others Similarly Situated,)
Plaintiff,)
v.)
SONUS NET WORKS, INC., HASSAN AHMED and STEPHEN NILL,)
Defendants.)

MICHAEL KAFFEY, Individually and On Behalf of All)
Others Similarly Situated,) Civil Case 1:04-cv-10345 DPW
Plaintiff,)
)
v.)
)
SONUS NETWORKS, INC., HASSAN AHMED and)
STEPHEN NILL,)
Defendants.)

HAIMING HU, Individually and on Behalf of All)
Others Similarly Situated,) Civil Case 1:04 cv 10346 DPW
Plaintiff,)
)
v.)
)
SONUS NETWORKS, INC., HASSAN AHMED and)
STEPHEN NILL,)
Defendants.)

DANIEL WILLIAMS, Individually and On Behalf of)
All Others Similarly Situated,) Civil Case 1:04 cv 10359 DPW
Plaintiff,)
)
v.)
)
HASSAN M. AHMED, STEPHEN J. NILL EDWARD)
T. ANDERSON, PAUL J. FEERRI, PAUL J.)
SEVERINO and SONUS NETWORKS, INC.,)
Defendants.)

CHARLES STARBUCK, Individually and on behalf of)
all others Similarly Situated,) Civil Case 1:04-cv-10362 DPW
Plaintiff,)
)
v.)
)
SONUS NETWORKS, INC., HASSAN AHMED and)
STEPHEN NILL,)
Defendants.)
SAMUEL HO, Individually and On Behalf of All)
Others Similarly Situated,) Civil Case 1:04 cv 10363 DPW
Plaintiff,)
)
v.)
)
SONUS NETWORKS, INC., HASSAN AHMED and)
STEPHEN. NILL,)
Defendants.)
JEFFREY C. RODRIGUES, Individually and On)
Behalf of All Others Similarly Situated,) Civil Case 1:04 cv 10364 DPW
Plaintiff,)
)
v.)
)
SONUS NET WORKS, INC., HASSAN M. AHMED)
and STEPHEN J. NILL,)
Defendants.)

ROBERT CONTE and MARK RESPLER, on Behalf of)
Themselves and All Others Similarly Situated,) Civil Case 1:04-cv-10382 DPW
Plaintiff,)
)
v.)
)
SONUS NETWORKS, INC., HASSAN AHMED and)
STEPHEN NILL,)
Defendants.)

WHEATON ELECTRICAL SERVICES)
RETIREMENT 401K PROFIT SHARING PLAN, On) Civil Case 1:04 cv 10383 DPW
Behalf of Itself and All Others Similarly Situated,)
Plaintiff,)
)
v.)
)
SONUS NETWORKS, INC., HASSAN AHMED and)
STEPHEN J. NILL,)
Defendants.)

MICHELLE BURK, Derivatively on behalf of Sonus)
Networks, Inc., A Delaware Corporation,) Civil Case 1:04 cv 10384 DPW
Plaintiff,)
)
v.)
)
HASSAN AHMED, EDWARD T. ANDERSON,)
PAUL J. FERRI, RUBIN GRUBER, PAUL)
SEVERINO, JOHN MICHAEL O'HARA, EDWARD)
N. HARRIS, STEPHEN NILL, PAUL R. JONES and)
SONUS NETWORKS, INC., A *DELAWARE*)
CORPORATION,)
Defendants.)

BRIAN CLARK, Individually and on Behalf of All
Others Similarly Situated,)
Plaintiff,)
v.)
SONUS NETWORKS, INC., PAUL R. JONES,)
EDWARD N. HARRIS, J. MICHAEL O'HARA,)
HASSAN M. AHMED and STEPHEN J. NILL,)
Defendants.)

MICHAEL PISNOY, Derivatively on Behalf of Sonus
Networks, Inc.,)
Plaintiff,)
v.)
HASSAN M. AHMED, RUBIN GRUBER, EDWARD)
T. ANDERSON, PAUL J. FERRI, ALBERT A.)
NOTINI, PAUL J. SEVERINO, PAUL R. JONES,)
EDWARD N. HARRIS, J. MICHAEL O'HARA and)
STEPHEN J. NILL,)
Defendants.)

SHEILA BROWNELL, Individually and On Behalf of
All Others Similarly Situated,)
Plaintiff,)
v.)
SONUS NET WORKS, INC., HASSAN AHMED and)
STEPHEN NILL,)
Defendants.)

SAVERIO PUGLIESE, on Behalf of Himself and All
Others Similarly Situated,)
) Civil Case 1:04-cv-10612 DPW
 Plaintiff,)
)
 v.)
)
 SONUS NETWORKS, INC., HASSAN M. AHMED)
 and STEPHEN J. NILL,)
)
 Defendants.)

DAVID V. NOCITO, on Behalf of Himself and All
Others Similarly Situated,)
) Civil Case 1:04 cv 10623 DPW
 Plaintiff,)
)
 v.)
)
 SONUS NETWORKS, INC., HASSAN M. AHMED)
 and STEPHEN J. NILL,)
)
 Defendants.)

Having considered the motion of Marc Wexler, Scott Baugh, Sajid Patel, Carlos Rios and Thomas Munson (the “Wexler Group”) for Consolidation, Appointment As Lead Plaintiff And Approval Of Selection of Lead and Liaison Counsel and the Memorandum of Law and Declaration of Theodore M. Hess-Mahan, in support thereof, and good cause appearing therefor:

1. The Actions are hereby consolidated;
2. The Wexler Group is hereby appointed Lead Plaintiff for the Class pursuant to Section 21D of the Securities Exchange Act of 1934; and
3. The law firm of Cauley Geller Bowman & Rudman, LLP is hereby appointed Lead Counsel and the law firm of Shapiro, Haber & Urmy is hereby appointed Liaison Counsel.

SO ORDERED THIS ____ day of _____, 2004.

U.S. District Judge